February 19, 2002

Union Pacific Railroad Company
Fulton Station Option Property
2nd and B Street
Fulton, CA
Case No. 1NSO736

Notice of Proposed No Further Action Related to Petroleum Hydrocarbon and Arsenic Discharge
Comment Period ends March 20, 2002

Problem Description: The Union Pacific Railroad (UPRR) Company, Fulton Station Option Property site is located along the southwest side of the rail line at the intersection of River Road with the railway in Fulton, California. The site is approximately 900 feet in length and ranges between 30-300 feet wide in an "L" shaped pattern.

A Phase I & II site assessment were conducted on the site in 1994 and 1995 due to a property transaction between UPRR and Northwestern Pacific Railroad Authority. During this time soil samples were collected from an area of previously observed stained surface soil located along a fence line shared with Fulton Processors Inc. Analytical results revealed maximum concentrations of TPH-diesel at 780 mg/kg and TPH-motor oil at 3,800 mg/kg. Soil contamination was found to a maximum depth of 1 foot below grade. Deeper soil samples collected at 2 and 3 feet were analyzed and results were below laboratory reporting limits.

Additional soil borings (20) were drilled onsite near the locations of former onsite structures such as an aboveground storage tank, a turntable, a tool house, an oil collector, an underground storage tank and a water supply well. Analytical results of the soil sampling event revealed an area of elevated levels of arsenic and lead near the former tool house.

Interim Actions Completed: Soil excavation of the metals impacted area was preformed in February 2001. Soil with concentrations of arsenic and or lead above 50 mg/kg was removed to the extent possible. A total of 67 soil samples were collected during the excavation activities, including confirmation samples which were collected approximately every 10 feet, along the side and base of the excavation. An onsite mobile lab, using X-Ray Fluorescence (XRF), was utilized to analyze the soil samples for lead and arsenic concentrations.

Every tenth soil sample collected was split into two samples for analysis. The onsite mobile lab received one of the samples and the other was sent to a state certified laboratory for metals analysis by Method 6010. Analytical results showed that the majority of the arsenic and lead impacted soil was removed during excavation activities. Only five of the forty-five confirmation soil samples contained arsenic and/or lead above 50 mg/kg. Further excavation in areas where samples revealed concentrations greater than 50 mg/kg was limited due to work restrictions within a 13-foot distance from the railroad tracks. Due to site restrictions some impacted soils were not excavated but were left in place. The analytical results revealed that soils with greater than 50 mg/kg of arsenic were found at 1 to 1.5 feet below grade. Soil samples collected at 2.5 feet below grade within the same area were identified through analysis and contained reported non-detect or low concentrations of arsenic. The same soil samples collected at 2.5 feet below grade were also analyzed for Lead and the concentrations were reported as non-detect.

A total of approximately 95 cubic yards of in-situ soil was removed from the initial excavation over an area of 1,090 square feet and to depths of 1, 2.5 and 5 feet bgs. A total of 215 cubic yards of in-situ soil were removed following confirmation soil sampling and additional excavation. Approximately 470 tons of soil, were transported to Forward, Inc. landfill in Stockton, California for disposal.

A modified Waste Extraction Test using deionizied water with a pH of approximately 5.5 was performed on eight of the forty five confirmation soil samples. Analytical results revealed arsenic above 5 ug/l in six of the eight samples. Lead was detected in one sample at 9.8 ug/l.

Two groundwater samples were collected within the arsenic impacted area. Analytical results revealed that arsenic, lead, and TPH-motor oil were below the laboratory reporting limits.

Groundwater elevation has been reported between 6-19 feet in monitoring wells associated with an adjacent underground storage tank site. Soil containing concentrations of arsenic and lead above 50 mg/kg, which was left in place, was found at depths of 1 to 1.5 feet below grade. Groundwater would seldom be in direct contact with impacted soil left in place.

Proposed Action: Regional Water Board staff has proposed no further action.

MTBE Status: Soil and groundwater samples were not analyzed for MTBE. Analysis was not necessary because a potential source of MTBE contamination was not identified onsite.

Unless comments are received with significant new information, Regional Water Board staff plans to concur with no further action upon conclusion of the comment period.

For further information concerning the UPRR Fulton Station site please contact Rachel Bosworth at (707) 576-2542 or email boswr@rb1.ca.gov.

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